

# **Ministry of Economy of Ukraine**

PROJECT

## **Ukraine Project Preparation Facility (P508490)**

### **Stakeholder Engagement Plan**

(DRAFT - Subject to changes)

January 2025

## List of abbreviations

DCG	Donor Consultative Group
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
EU	European Union
FIRST	Facility for Investment Readiness and Systems Transformation
FPPU	Facility for Project Preparation Unit
GM	Grievance Mechanism
GOU	Government of Ukraine
GRM	Grievance Redress Mechanism
IFI	International Financial Institution
MCTD	Ministry of Community and Territorial Development
MOE	Ministry of Economy
MOF	Ministry of Finance
NGO	Non-Governmental Organization
PDO	Project Development Objective
PFF	Project Preparation Facility
PIM	Public Investment Management
PMU	Project Management Unit
PPP	Public-Private Partnership
PPP Agency	Public-Private Partnership Agency
PPF	Project Preparation Facility
PPU	Project Preparation Unit
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SIC	Sectoral Investment Committee
SPP	Single Project Pipeline
TA	Technical Assistance
URTF	Ukraine Relief, Recovery, Reconstruction, and Reform Trust Fund
WBG	World Bank Group

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## 1. Introduction

### 1.1. Country and sectoral context

Russia's invasion of Ukraine has inflicted a devastating toll on the country and Ukraine's recovery, reconstruction, and operating needs are staggering. According to the Third Rapid Damage and Needs Assessment (RDNA3),<sup>1</sup> produced by the Government of Ukraine (GOU), the World Bank Group (WBG), the European Commission (EC), and the United Nations, as of December 2023 the estimated cost of Ukraine's recovery and reconstruction stands at \$486 billion over the next decade. The biggest needs are in housing (17%), transport (15%), commerce and industry (14%), agriculture (12%), energy (10%), social protection and livelihoods (9%), and explosive hazard management (7%).

While the GOU has so far focused on national security, stabilizing the economy, and sustaining core government services, there is growing recognition that Ukraine needs to start building capacity for reconstruction, long-term development, and EU accession. Given Ukraine's vast reconstruction and recovery needs and the investment gap, the GOU is reforming its Public Investment Management (PIM) to ensure that domestic resources and external financing are allocated to priority areas. The PIM is structured around a single, standardized planning and project cycle with the Ministry of Finance (MOF), Ministry of Economy (MOE), and Ministry for Communities and Territories Development (MCTD)<sup>2</sup> playing coordinating and gatekeeping roles. The current multiple channels for investment projects have been replaced by a Single Project Pipeline (SPP) established under the PIM, which comprises planning, identification, preparation, appraisal, approval, and budgeting stages. The Cabinet of Ministers established a Strategic Investment Council (SIC) in May 2024, as an advisory body to the Government to develop a single project portfolio for public investment. The SIC plays a high-level oversight and approver role for the PIM system, including the Single Project Pipeline. The SIC is composed of all line ministries of Ukraine. In 2024, the PIM system was piloted at the central level with plans to expand it to local levels in 2025.

The World Bank is currently supporting the Ukraine PIM process through separate projects. Technical assistance to improve the Ukrainian Government's capacity to plan and finance recovery and reconstruction under the PIM will be provided through the Strengthening Government Capacity for Fiscal Reform Implementation (STRONG) project. STRONG is funded by a \$10 million grant from the Ukraine Relief, Recovery, Reconstruction, and Reform Trust Fund (URTF). The PIM reform and implementation of the PIM Roadmap are being supported through another World Bank-financed Program for Supporting Reconstruction through Smart Fiscal Governance (SURGE).

Despite significant efforts by the Ukrainian government and international donors, including the World Bank, challenges remain in advancing recovery and reconstruction due to limited capacity and funding for preparing implementation-ready projects. To address this, the government is working with international financial institutions (EIB, EBRD, and the World Bank Group) to establish the Framework for Project Preparation for Ukraine (FPPU). This framework will coordinate project preparation through multiple Project Preparation Facilities (PPFs), enabling the government to prepare priority recovery and reconstruction projects in line with quality, fiduciary, and environmental and social standards. The FPPU will facilitate the efficient use of public and donor resources in the short term while paving the way for Public-Private Partnerships (PPPs) and private financing in the medium term.

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<sup>1</sup> <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099021324115085807/p1801741bea12c012189ca16d95d8c2556a>

<sup>2</sup> Same as Ministry for Communities and Territories Development.

The FPPU is guided by six key principles: (1) government ownership and alignment with Ukrainian priorities, focusing on projects prioritized by the SIC and included in the SPP; (2) regional cohesion to reduce disparities, support damaged regions, and ensure equitable access to resources, with full inclusion of local communities; (3) capacity building within the government for long-term sustainability; (4) transparent project allocation based on clear criteria, matching needs with appropriate delivery modalities and support from PPFs for project development stages; (5) transparent cooperation and information sharing among donors and financiers through the Donor Consultative Group (DCG); and (6) streamlined, agile processes to ensure timely and efficient project preparation and delivery in alignment with Ukraine's needs.

The FPPU is set to include two major project preparation facilities: the Ukraine Government Project Preparation Facility (the "PPF") and Ukraine FIRST, both supporting project preparation aligned with EU accession requirements. The Ukraine Government PPF, co-developed by the Ukrainian government with technical support from the World Bank, focuses on beneficiary-executed project preparation with advisory services and is open to projects regardless of funding source. Additional PPFs targeting public investments may be integrated into the FPPU and coordinated under the SIC to align project preparation with government priorities.

## 1.2. Project Information

The Ukraine Government Project Preparation Facility is being designed and developed by the GOU with the support of the World Bank Group with a goal of placing it within the GOU's institutional structure. It will be a mechanism owned by the GOU, enabling the GOU to develop the required expertise and institutional capacities to become an effective complement for Ukraine's Reconstruction in the medium and long term. The proposed design of the Ukraine Government PPF provides an opportunity for the GOU to establish a government administered and executed PPF.

The Ukraine Government PPF Project consists of three components:

**Component 1: Strengthening Institutional and Technical Capacity (US\$10 million).** The capacity of the Ukraine Government has been ravaged by Russia's invasion of Ukraine. This capacity will grow over time, in particular after the end of the war, but the Government will need help growing those skills and rebuilding its capacity. This component will support capacity development for PPF stakeholders around the institutional and technical issues fundamental to the success of the PPF, including the governance and functioning of the Ukraine Government PPF and as well as latest best practices on how to prepare infrastructure projects in different sectors. This will include: capacity strengthening for the staff of the Ukraine Government PPF, under the PPP Agency such as funding the delivery of a range of capacity building, including classroom training and study tours; requirement of expert advisors for beneficiaries to address any areas of weakness or need given the scope of work associated with support from the Ukraine Government PPF; institutional strengthening across project preparation framework, specifically support integration of all the PPF within the PIM system such as policy development, guidance materials, and any other processes required to support the smooth integration of the PPF, including coordination between the PPF and the PIM, SPP, and PPU, as needed. This will also include training for any GOU officials and other stakeholders involved in the PIM system.

Additional support to project implementation will be provided with the help of a Bank-Executed grant allocated through the URTF. It is envisaged that additional support to the establishment and operationalization of the Ukraine Government PPF, outside the scope of this Project, will include the engagement of a third-party management support contractor. The contractor will provide day-to-day capacity and technical support to PPP Agency staff and will provide local and foreign experts to assist with operation and management of the Ukraine Government PPF. Continuous support from the Bank side will be provided to ensure access to global knowledge,

sharing lessons learned, connecting with other PPFs around the world to learn from successes and challenges. The additional support provided by the management support contractor will supplement and complement institutional and capacity building strengthening, including the use of individual consultant expertise, provided under Component 1 of this Project.

**Component 2: Preparation of Priority Projects (US\$50 million).** This component will fund preparation of projects allocated to the PPF by the PPU. The Ukraine Government PPF team will review project preparation requests and identify needed technical assistance to prepare projects that are viable, environmentally and socially sustainable, and meet EU accession requirements in particular with regards to alignment with pan-European strategies, taking into account EU rules and standards, and following impact assessments framed by the acquis. It is expected that initial projects prepared under the PPF will be structured as public investment projects. In the post-war reconstruction phase, there is an intention that the PPF will consider the identification and preparation of projects under PPP modalities, dependent on the country's macro-economic conditions and private sector appetite. This component will include the following support: design and structuring of projects, pre-feasibility analysis and concept definition, Environmental & social studies (including ESIAAs), detailed feasibility and design studies, analysis of the financial and economic case for the proposed project to inform the government's investment decision (incorporating financial viability assessment, fiscal impact analysis and economic appraisal); detailed legal and regulatory due-diligence and preparation of modifications required to support the proposed project; financial structuring to attract private funds and/or share risks with private sector, as and where appropriate.

**Component 3: Project Management (US\$10 million).** This component will fund the running of the Ukraine Government PPF core team, including management, administration, and operational functions, such as office costs, salaries of the core team consultants, project audits, travel and outreach to external stakeholders, meetings, events, workshops, etc.

### **1.3 Purpose and Objectives of the Stakeholder Engagement Plan**

The Ministry of Economy of Ukraine (MOE) recognizes the importance of effective communication and stakeholder engagement for successfully implementing reconstruction projects. To this end, the Ukraine Government PPF Project will have strong communication and stakeholder engagement to ensure that all the stakeholders are being informed and consulted throughout the project cycle.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the Ministry of Economy will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

Given that the project is comprised of technical assistance to prepare future investments that have not yet been selected, the SEP takes the format of a framework approach, outlining general principles and a strategy to identify stakeholders and plan for an engagement process in accordance with the World Bank's Environmental and Social Standard on Stakeholder Engagement and information disclosure (ESS10), once the projects are selected.

The main objective of the SEP is the following:

- To ensure projects prepared under the Ukraine Government PPF Project will meet the stakeholder engagement requirements of the Ukrainian legislation and the World Bank Environmental and Social Standard 10.
- To identify key stakeholders that are affected, and/or able to influence the Ukraine Government PPF Project and its activities in preparing future projects for investment
- To develop a practical tool for the Project management Unit (PMU) to develop smooth stakeholder engagement plans for each project once selected
- To develop a stakeholder engagement process that allows stakeholders to participate and influence the design and implementation of the Ukraine Government PPF Project including the planning of future investment projects, in a meaningful way
- To define the information disclosure provisions
- To establish a formal Grievance Redress Mechanism
- To define roles and responsibilities for the implementation of the SEP
- To define the monitoring arrangements to ensure that the SEP remains an effective and up-to-date tool for stakeholder engagement

## **2. National legislative framework and international standards**

### **2.1 Ukraine Citizen Engagement Legislation**

Ukrainian citizens' right to participate in the administration of state affairs and in all local referendums is granted by the Constitution of Ukraine, Articles 38. Article 40 of the Constitution also enables all citizens to file individual or collective petitions or to personally appeal to bodies of state power, bodies of local self-government, and the officials and officers of these bodies. People's rights relating to access to information, consultation, and engagement are further recognized in three Ukrainian legislative and regulatory acts<sup>3</sup>.

The first constitutes the Law of Ukraine on Access to Public Information (2011), the second, Law on Appeals № 47 (1996), and the third is vested in the Decree of the Cabinet of Ministers of Ukraine (November 3, 2010) No. 996 "Order of the public consultations on the issues of development and implementation of the state policy"<sup>3</sup>. The Law on the Access to Public Information (2011), determines procedures for exercising and securing the right of every person's access to information of public interest possessed by government agencies and other providers of public information as identified by this Law. In Article 3 the law also stipulates guarantees of observance where providers' obligation to:

- 1) provide and disclose information;
- 2) to establish special information services and/or systems within information-providing entities to secure access to public information by the established procedures;
- 3) to simplify procedures for submission of requests and receipt of information;
- 4) free access to open sessions of government agencies;
- 5) parliamentary, civil, and state control over observance of the right to access public information and information access modes;

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<sup>3</sup> <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80>.

6) legal responsibility for violation of the legislation on access to public information.

The Law on Appeals № 47 (1996) further grants Ukrainian citizens the right “to apply to state bodies, local self-government, associations of citizens, enterprises, institutions, organizations regardless of ownership, mass media, officials according to their functional responsibilities with comments, complaints, and proposals concerning their statutory activities, a statement or petition for the exercise of their socio-economic, political and personal rights and legitimate interests, and a complaint about their violation.” The Law of Appeals was reinforced in 2015 by the citizens’ right to file electronic petitions on corresponding portals instituted for this purpose by the President’s Administration, Parliament, the Government (“central authorities”), and hundreds of local bodies of self-government (“local authorities”). The last, third decree of the Cabinet of Ministers of Ukraine ensures that the public is consulted on the issues of development and implementation of state policies

All three regulatory acts and the Constitution of Ukraine will serve as the base reference for informing the stakeholder engagement plan and its activities throughout the project’s implementation.

There are also the Ukrainian legislative documents on public participation and disclosure of information particularly on environmental issues:

Decree of the Ministry of Environmental Protection of Ukraine "On Approval of the Regulation on Public Participation in Decision Making on Environmental Protection Issues" #168 of December 12, 2003.

The Law of Ukraine “On Environmental Protection” #1264-XII adopted on July 25 (article 9) defines the roles and procedures as regards the public disclosure of information about the environment and its protection. The Law states that "Every citizen of Ukraine has the right to ... participate in the discussion and submission of proposals to materials on the placement, construction and reconstruction of facilities that may adversely affect the environment, making proposals to public authorities, local governments and legal entities involved in decision-making on these issues".

The [Law of Ukraine “On Environmental Impact Assessment”](#) (“On EIA/OVD”) (2017) defines public participation and information disclosure in the environmental protection proceedings and environmental impact assessment (art. 2,7,8,14). Under the law, the preparation of the EIA requires the conduct of public hearings. The procedure begins with the publication of a notice about the start of public consultation, which is required to be published within three working days after the EIA report is received by the relevant authorities. This notice must be made available on the official website of the authorized territorial or central body and in public places within the area where the planned activity is to take place. The public consultations period lasts between 25 and 35 working days, starting from the official announcement. During this time, the public is granted access to the EIA report and other relevant information, ensuring that stakeholders can review and comment on the planned activity. Written comments can be submitted electronically or in person, and oral comments can be made during public hearings, which are also a required part of the consultation process.

The authorized authorities are tasked with organizing public hearings and providing access to the necessary information. The hearing provides a platform for local communities to voice their concerns and ask questions about the environmental impacts of the planned activity. Once the consultation period concludes, the authorities prepare a report on the public consultation process. This report includes a summary of the public comments, the hearing minutes, and a table showing how the comments were addressed. It is then submitted to the Unified Environmental Impact Assessment Register. The results of the public consultation and the final EIA report must be disclosed, ensuring transparency in the decision-making process. If no comments are received within the consultation period, it is deemed that no objections were raised.



The Aarhus Convention (ratified by Ukraine on 18th November 1999) establishes several rights to individuals and civil society organizations about the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities, at a national, regional, or local level, will contribute to these rights to become effective. The Aarhus Convention provides for:

**Access to environmental information.** The right of the citizens to receive environmental information that is held by public authorities

**Public participation in environmental decision-making.** The right of the citizens to participate in preparing plans, programs, policies, and legislation that may affect the environment.

**Access to justice.** The right of the citizens to have access to review procedures when their rights concerning access to information or public participation have been violated.

## 2.2 World Bank requirements for stakeholder engagement

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10 Stakeholder Engagement and Information Disclosure, which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by the ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of a project's environmental and social risks. Key elements of ESS10 include:

"Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project. Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders. The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not."

Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders must be identified, and the SEP has to be disclosed for public review and comment as early as possible before the project is appraised by the World

Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed promptly.

### 3. Key Principles for Stakeholder Engagement Planning for future projects prepared under the Ukraine Government PPF Project.



The Ukraine Government PPF Project will support *upstream* preparation of potential projects selected by the PMU from the GoU's Single Project Pipeline ; these projects have passed *concept stage*. Upstream preparatory activities under the Ukraine Government PPF Project will consist of preparing a range of studies and documentation including:

- Design and structuring of projects: Detailed planning for project preparation and structuring
- Pre-feasibility analysis and concept definition: Preliminary market, technical, environmental, social, land and climate-related issues; legal, regulatory, security assessment, reforms required to enable successful projects; cost-benefit analysis; preliminary design and appraisal
- Environmental & social studies (including ESIA's): Assessment of environmental and social risks and impacts of each project, consistent with the World Bank ESF. This may include environmental and social impact assessments and other E&S assessments for the eventual investment, commensurate with the E&S risks of the project, and its design stage (conceptual versus detailed). Therefore, environmental and social studies may be integrated into feasibility studies, or may be stand-alone.
- Detailed feasibility and design studies: Demand analysis, technical feasibility and engineering cost estimates studies, concept designs, financial and economic assessments of the investment, de-risking assessment (including for co-investment/de-risking decisions by IFIs and DFIs), geotechnical or resource assessments, detailed designs for construction projects in line with EU requirements (including environmental and social), construction project drawings and specifications (construction documents) and other design documents. Feasibility studies and design documents will need to meet the requirements of the State Expertise.
- Business case: Analysis of the financial and economic case for the proposed project to inform the government's investment decision (incorporating financial viability assessment, fiscal impact analysis and economic appraisal); detailed legal and regulatory due-diligence and preparation of modifications required to support the proposed project.
- Financial structuring to attract private funds and/or share risks with private sector, as and where appropriate: Assessment of proposed financing mechanisms and potential for maximizing the participation of private sector in project financing (e.g. through a range of PPP/concession structures), preparation of risk allocation matrices, proposed contractual structure and its commercial viability, initial market sounding with potential investors.

There are no civil works as part of the Ukraine Government PPF Project and therefore there are no direct adverse environmental or social impacts that are expected to affect the livelihoods or economic activities of targeted beneficiaries, including local communities, government agencies, current land users, and other vulnerable or disadvantaged groups. Downstream investments may, in the future, pose varying levels of environmental and social risks and impacts. However, the Ukraine Government PPF Project itself, at the upstream stage of project development, represents the essential opportunity to identify priority E&S risks and impacts of a future investment, identify stakeholders and conduct stakeholder engagement commensurate with the early stages of project development and the E&S risks of the project.

As outlined in the previous section, once specific projects are selected from the Single Project Pipeline (SPP) and packages of technical documents are being prepared, the relevant authorities— including the PMU, supported by the Ukraine Government PPF Project and its Project Management Consultant will complete the following steps in analyzing and identifying stakeholders for each specific project and preparing SEPs that are commensurate with the E&S risks of the project and phased appropriately. Templates for preparing SEPs for future reconstruction projects prepared under the Ukraine Government PPF Project are provided in [Annex 1](#) and [Annex 2](#) of this document.

**STEP 1: E&S Screening:** Projects selected to be prepared under the PPF will all be screened for E&S risks using **the Environmental and Social Management Framework (ESMF)** required as per the **Environmental and Social Commitment Plan (ESCP)**. The screening will be elaborated in the ESMF and results in assigning an Environment and Social Risk Rating for each future investment project (i.e. High/Substantial/Moderate/Low). The screening is an integral input to preparing the SEP because 1) it is an indicator of the complexity of the project and priority E&S risks that need to be consulted with stakeholders even at an early stage. The complexity of the SEP is commensurate with the risk rating. 2) Identifies the E&S instruments that need to be prepared as part of the preparation package (e.g. integrating E&S issues into the feasibility study and design/or preparing a Terms of Reference for the ESIA or a stand-alone ESIA; 3) these various instruments may have their own requisite stakeholder engagement processes that need to be planned as part of the SEP to meet legal requirements and ESS10.

**STEP2: Stakeholder Identification and Analysis.** As the design of the project progresses from its original concept toward a defined design, it is important to identify stakeholders on a more systematic basis. Stakeholder mapping and analysis involves recognizing all individuals, groups, and organizations that may be affected by or have an interest in the project. Stakeholders include project-affected parties, other interested parties, and vulnerable or disadvantaged groups. This analysis aims to understand stakeholders' needs, concerns, and expectations, providing critical insights into how the project may impact them and how best to engage with them. By mapping these groups and analyzing their influence and interests, this stage lays the foundation for tailoring subsequent engagement activities. It ensures that the SEP is inclusive and that no stakeholders, particularly those in vulnerable situations. Stakeholder identification and analysis informs formal ESIA studies and provide information to input into other project feasibility studies and risk analysis.

**STEP3: Developing the Stakeholder Engagement Program.** The Stakeholder Engagement Program defines how and when stakeholders will be engaged throughout the project lifecycle. During planning /preparation stages the program will guide stakeholder consultations and communications during the period of the main ESIA studies and other aspects of the project analysis and design. It includes strategies for information disclosure to ensure stakeholders are informed about the project's goals, progress, and impacts in a clear and accessible manner. The engagement program also specifies the methods and tools that will be used to facilitate consultations and active participation, such as community meetings, focus groups, workshops, or

online discussions. Special attention is given to vulnerable groups to address barriers to participation and ensure they can meaningfully engage with the project. Additionally, the program outlines key messages that will be tailored to the needs and preferences of different stakeholder groups, ensuring transparency, trust, and inclusivity in communication efforts. This component ensures that stakeholders' voices are heard, and their feedback is integrated into the project design and implementation.

**STEP4: Operating a Grievance Mechanism.** A robust grievance mechanism is essential for addressing stakeholder concerns and fostering trust throughout the project. Each Beneficiary Agency working with the Ukraine Government PPF has its own GRM as per national law and the constitution. The Project will establish reporting requirements for Beneficiary Agencies to regularly report on complaints received about investment projects under preparation. The mechanism must be accessible to all stakeholders, including vulnerable groups, with multiple channels for submission such as hotlines, email, or local offices. It should also include specialized protocols for handling sensitive issues, such as SEA/SH-related grievances, with confidentiality and care. The grievance mechanism not only provides a platform for resolving disputes but also serves as a monitoring tool to track issues and identify trends, enabling continuous improvement in stakeholder engagement practices.

## 4. Stakeholder mapping: stakeholder identification and analysis

### Stakeholder Mapping for Future Project Investments

The procedure of stakeholder identification and analysis is described below in this section.

Stakeholder Mapping is a two-step process to **identify** stakeholders that may be impacted by the projects and **assess** the level of engagement with them by the project. Stakeholder mapping also allows for the identification of groups that may be typically excluded or marginalized and who may benefit from a more targeted outreach approach. Stakeholder mapping should identify individuals, groups, local communities, and other stakeholders that may be directly or indirectly affected by the project, positively or negatively. Stakeholder mapping should be done in collaboration with the beneficiary agency and build on previous stakeholder identification done at preceding Concept Stage. This will be supplemented with demographic and geographical information about communities and sensitive receptors (e.g. schools, hospitals, religious buildings) in the project area, local NGO and community-based organization (CBO) information to enhance outreach and inclusive participation at relevant community consultations and in particular, plan targeted activities for vulnerable groups.

According to the World Bank ESS 10 the SEPs should identify the following types of stakeholders:

**Project-Affected parties:** The SEP of the future projects should focus particularly on those directly and adversely affected by project activities because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

**Other interested parties:** The SEP should identify individuals or groups with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include local councils, women's organizations, other civil society organizations, and cultural groups.

**Vulnerable groups:** Vulnerable and disadvantaged individuals or groups are those who may face barriers to participation, cannot express their concerns, or may not fully understand the impacts or benefits of a project. These groups are sometimes excluded from stakeholder engagement processes due to social, economic, or physical challenges. In Ukraine, rural and marginalized populations often face systemic disadvantages, particularly in areas with poor infrastructure and limited access to resources. Rural communities rely heavily on agriculture and small-scale industries, and these groups may lack access to essential services, transport infrastructure, and economic opportunities. Similarly, internally displaced families, especially those displaced by conflict, often struggle to re-establish their livelihoods and access critical services. Also the ongoing situation, a significant layer of veterans has emerged in Ukrainian society who need access to quality medical, rehabilitation, and other socially important public services.

The Ukraine PPF will ensure that, during the preparation phase of specific projects, appropriate measures are designed to address these challenges. Targeted stakeholder engagement will include tailored outreach strategies, culturally appropriate communication methods, and participation facilitation for vulnerable groups. Particular focus will be placed on addressing accessibility challenges and providing transparent, meaningful information to ensure their voices are heard in the project's design and decision-making processes including ESIA processes.

Within communities that may be or affected by projects, , vulnerable and disadvantaged groups may be those in most proximity to projects, or may be those that are most vulnerable to change and sensitive to impacts, include the following:

- Internally displaced persons (IDPs), including families with children, due to the ongoing conflict in Ukraine;
- Veterans and members of their families, family members of deceased veterans and defenders of Ukraine;
- Families with children with disabilities or special needs;
- Low-income households, particularly those with multiple dependents;
- Marginalized ethnic communities, such as Roma populations;
- Rural populations in areas with limited infrastructure and opportunities;
- Elderly populations and people with disabilities who may face mobility challenges;
- Women-headed households, who often bear additional economic and social burdens.

At this stage of establishing the Ukraine Government PPF Project , specific geographical areas of intervention and individual projects details have not yet been identified. Once the projects are selected and their locations determined, the relevant beneficiary agencies , and the PMU, advised by the Ukraine Government PPF's Project Management Consultant, will:

1. Identify vulnerable and disadvantaged groups within the project intervention areas to ensure they are adequately included in the engagement process;
2. Engage with these groups in line with the approaches and principles outlined in this Stakeholder Engagement Plan (SEP), ensuring inclusivity and equity;
3. Assess impacts and benefits to address any barriers to participation and create enabling conditions that allow these groups to benefit fully from project outcomes.

The guideline questionnaire for the identification and categorization of stakeholders for construction projects SEPs is provided in [Annex 3](#) of this document.

The following stakeholders have been identified and analyzed relevant to the Ukraine Government PPF Project:

Stakeholder group	Interests	Influence	
		Interest	Impact
<b>International level</b>			
World Bank Group (WBG)	Providing financial and technical assistance, capacity building, and adherence to international standards including environmental and social safeguards.	High	High
Donor Consultative Group (DCG)	Coordination between donors and supervision of the Ukraine PPF project implementation process.	High	High
Other International Financial Organizations (IFOs), Multilateral and Bilateral Donors	Providing financial and technical support.	High	High
International Consulting Firms and Experts	Providing consultancy services including offering an expertise in development feasibility studies, technical design for projects.	Medium	Medium
<b>National level</b>			
GoU	Overall oversight and ownership of the Ukraine PPF.	High	High
Ministry of Finance (MoF)	Oversight of financial structuring, project sustainability, and resource allocation.	High	High
Ministry of Economy (MoE) including	Hosting ministry of the Ukraine PPF; coordination of project preparation and alignment with national economic goals.	High	High
The Agency on Support of Public-Private Partnership (PPP Agency)	Existing state-owned, non-profit organization established under the MOE, is proposed by the GOU to be enabled to take over the PPF.	High	High

Ministry for Communities and Territories Development	Coordinating strategic planning for regional development; directly responsible for the recovery of the country and the implementation of restoration projects; responsible for the development and implementation of the Digital Restoration EcoSystem for Accountable Management (DREAM) as bank for public investment projects.	High	High
The State Agency for Reconstruction and Development of Infrastructure of Ukraine	Preparing and implementing large-scale infrastructure projects in accordance with the medium-term plan of priority public investments.	High	Medium
Strategic Investment Council chaired by the Prime Minister of Ukraine	Coordinating project preparation and ensuring alignment with strategic priorities for public investment and the Single Project Pipeline (SPP).	High	High
Line Ministries and government agencies	Beneficiaries of the Ukraine Government PPF; receiving technical assistance for preparation for the implementation of infrastructure projects and capacity building; ensuring alignment with national policies and sectoral priorities.	High	High
State-Owned Enterprises (SOEs)	Beneficiaries of the Ukraine Government PPF; receiving technical assistance for infrastructure projects and capacity building.	Medium	Medium
Accounting Chamber	Conducting financial and efficiency audits of programs and expenditures related to public investments	Medium	Medium
State Audit Service of Ukraine	Analysis and verification of the legality and efficiency of investment projects using funds from the state and local budgets, state support, state and/or local guarantees, as well as analysis and verification of the achievement of performance indicators, management of investments (funds).	Medium	Medium
National Consulting Firms and Experts	Providing consultancy services including offering an expertise in development feasibility studies considering the local context, technical design for projects.	Medium	Medium

National Think Tanks and Research Institutions	Providing research, policy analysis, and recommendations to strengthen project preparation.	Medium	Medium
NGOs and Civil Society Organizations (CSOs): A list of NGOs and CSOs that may be engaged during the preparation of the Ukraine PPF is provided in <b>Annex 4</b> .	Advocating for inclusivity, transparency, and sustainability in project preparation processes.	Medium	Medium
Private Sector as potential investors	Exploring opportunities for PPPs, co-financing, and involvement in infrastructure development.	High	High
Private sector - design and engineering companies	Providing services for the preparation of project documentation, including technical design for projects.	Medium	Medium
<b>Regional and Local level</b>			
Regional and local authorities, municipal departments	Beneficiaries of the Ukraine Government PPF; receiving technical assistance for preparation for the implementation of infrastructure projects and capacity building; responsible for coordinating project priorities in their areas.	High	Medium
Balance sheet holders, municipal and utility companies	Operators of infrastructure assets and providers of all relevant information about infrastructure assets and projects needs.	Medium	Medium
Consumers and local population	Final beneficiaries, users of socially important public services, the improvement of access and quality of which will be ensured through the quality preparation of public investment projects	High	Medium

## 5. Stakeholder engagement Program

### 5.1. Summary of stakeholder engagement done during preparation of the PPF

The preparation of public investment projects that will be processed as part of the project preparation quality is based on strategic documents of Ukrainian legislation. In turn, the Resolution of the Cabinet of Ministers of Ukraine No. 996 of November 3, 2010, states that the development of documents containing norms that define strategic goals, priorities and objectives in the relevant area of public administration (including draft state and regional programs of economic, social and cultural development, decisions on their



implementation) is subject to mandatory public consultation in the form of public discussion and/or electronic public consultation. Thus each project that enters the Project Preparation facility is bound to publicly discussed strategic priorities. During this prestage of preparing and establishing the Ukraine Government PPF Project , the following public consultation meetings will be/were conducted:

Meeting	Timing and location	Participants	Key issues discussed, summary of received feedback
Working group of Ukraine Donor Platform	December 19, 2024 Online meeting	Representatives of Ministry of Economy, Ministry of Finance, Ministry of Development, World Bank, European Investment Bank, European Bank for Reconstruction and Development, Foreign, Commonwealth & Development Office, U.S. Department of State, European Commission, Reform Delivery Office of Secretariat of Cabinet of Ministers of Ukraine.	The current status of the framework for project preparation was presented. The timeline and stages of rollout of the Ukraine Government Project Preparation Facility was discussed.
Working group on strategic and budget planning and methodological support of public investments	December 26, 2024 Online meeting	Representatives of Ministry of Economy, Ministry of Finance, Ministry of Development	Ministry of Economy presented the idea to establish on the base of the PPP Agency the Project preparation facility (PPF) that will help to prepare bankable projects from SPP.

The first round of SEP disclosure and public consultations is planned for mid-January 2024. Invitations will be sent in advance to a broad range of stakeholders, including representatives from donor organizations, central government bodies, consulting firms, non-governmental organizations (NGOs), and civil society organizations (CSOs). In addition, the information about the Project and SEP will be sent to Regional Authorities requesting to provide feedback. During the consultations, the project design will be introduced, along with an overview of the SEP’s objectives as well as potential environmental and social risks will be highlighted along with mitigation measures. The critical role of stakeholders in the decision-making process will be emphasized, and accessible communication channels for providing feedback will be outlined. All feedback received during the consultations will be carefully reviewed, integrated into the project design, and summarized in the table

above. A comprehensive consultation protocol, including meeting minutes, will be included as an [Annex 5](#) to this document. Following the consultations, the revised SEP, incorporating records of the consultations, will be re-disclosed on official websites in both English and Ukrainian languages.

## **5.2. Engagement methods and tools**

As the SEPs are developed for projects that will be prepared under the Ukraine Government PPF Project, the various methods of engagement will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with statutory officials and local authorities may be different from a format of liaising with the local communities.

The format of every consultation activity should meet general requirements on accessibility, i.e. should be held at venues that are easily reachable and do not require a long commute, entrance fee, or preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness, i.e. engaging all segments of the local society, including disabled persons, the elderly, minorities, and other vulnerable individuals.

Due to the security risks caused by the ongoing conflict in Ukraine, the format of stakeholder engagement activities will be carried out online, but in person meeting will be determined on a case-by-case basis, taking into account the current security situation and the organizers' ability to ensure participants' safety. In the case of in-person events, the availability of a functioning shelter is mandatory.

## **5.3. Description of engagement methods**

Various methods of engagement will be used as part of the preparation of projects and their interaction with the stakeholders, Consultation events will be customized to suit the main identified purpose and will vary depending on the complexity of the project and stage of project design. For example:

At Pre-feasibility and Feasibility Stage, the purpose of the consultation may be to gauge public support, identify E&S risks, and inform strategic decisions and project alternatives.

For projects required to undertake formal ESIA studies, it is good practice to conduct consultations at scoping stage to gathering primary information with an emphasis on listening to issues of greatest concern to stakeholders. As the project design and ESIA progresses, consultations should be conducted to engage stakeholders on mitigation and enhancement measures and ways to optimize social, economic and environmental benefits of the project. According to the World Bank guidance on stakeholder engagement, stakeholders should be provided with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional, and national, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the target community.

These parameters can be achieved by implementing the following approach:

- Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication, i.e. it should be made available via publicly accessible locations and channels. The Project keeps proof of the publication (e.g. a copy of the announcement) for accountability and reporting purposes. The photos and evidence of the consultations announced by posters/advertisements/screenshots from the websites etc. should be attached as the annex.
- Another critical aspect of any meeting preparation process is selecting the methods of communication that reach the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the proposed. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected community representatives/ local NGOs to relay up-to-date information on the project and consultation meetings to other members of the community, Advertising the project and the associated meetings via radio or television and making direct calls (in case fixed-line or mobile phone communication is available) is another method that allows reaching out to the remote audiences. The announcement of a public meeting or a hearing is made sufficiently in advance, thereby enabling participants to make necessary arrangements, and provides all relevant details, including date, time, location/venue and contact persons.
- Placement of the project materials in the public domain is also accompanied by making available a register of comments and suggestions that can be used by any member of the affected community and general public to provide their written feedback on the contents of the presented materials. As a rule, the register is made available for the entire duration of the requisite disclosure period. Where necessary, a project representative or an appointed consultant should be made available to receive and record any verbal feedback in case some stakeholders experience difficulty with providing comments in written form.
- Drafting an agenda for the consultation meeting is an opportunity to provide a clear and itemized outline of the meeting's structure, sequence, chairpersons, a range of issues that will be discussed, and a format of the discussion (e.g. presentation/ demonstration followed by a Questions & Answers – Q&A session, facilitated work in small groups, feature story and experience sharing, thematic sessions with a free speaking format enabling the exchange of ideas). A clearly defined scope of issues that will be covered at the meeting allows the prospective participants to prepare their questions and comments in advance. It is essential to allocate a sufficient amount of time for a concluding Q&A session at the end of any public meeting or hearing. This allows the audience to convey their comments and suggestions that can subsequently be incorporated into the design of the project. Keeping a record of all public comments received during the consultation meetings enables the project's responsible staff to initiate necessary actions, thereby enhancing the project's overall approach taking into consideration the stakeholders' priorities. The recorded comments and how they have been addressed by the project become appropriate material for inclusion in the project's regular reporting to the stakeholders.
- Distribution of targeted invitations to the consultation meeting is an important element of the preparation process and is based on the list of participants that is compiled and agreed in advance of the consultation. Invitations may be sent both to certain individuals who have been specifically identified as relevant stakeholders (e.g. representatives of authorities, leaders of local NGOs and initiative groups, village chairpersons, etc) and as public invites (e.g. addressed to initiative and professional bodies, local organizations, and other public entities). Text of individual invitations can be tailored to reflect the specifics of an invitee and their role in the process, whereas the text of public invitations normally indicates general details. The means of distributing the invitations should be appropriate to the customary methods of communication that prevail locally in the Project Area of Influence (Aoi). The invitation should typically contain a clear request for confirmation of the participation, also specifying a date by which the

confirmation is expected. All invitations that were sent out are tracked in order to determine and manage the response rate. If no response has been received, the invitation can be followed up by a telephone call or e-mail where possible.

An attendance list is made available at the commencement of the consultation in order to record all participants who are present at the meeting and their affiliations. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or the general public) should be included in addition to those who have registered for the meeting in advance.

Taking records of the meeting is essential both for the purposes of transparency and the accuracy of capturing public comments. At least three ways of recording may be used, including:

- taking written minutes of the meeting by a specially assigned person or a secretary;
- audio recording (e.g. by means of voice recorders);
- photographing (screenshotting)

Where feasible, the video recording may also be undertaken. The combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

#### **5.4. Description of information disclosure methods**

As a standard practice, the environmental and social studies (ESMF, ESIA, ESMP, SEP, etc) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently formally documented by MOE and PMU. MOE and PMU will continue applying a similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. The ESMF report, in Ukrainian, will be made available for public review for 60 days. The SEP will be released in the public domain simultaneously with the ESMF and will be available for stakeholder review during the same period, i.e. 60 days. Distribution of the disclosure materials will be through making them available at venues and locations frequented by the community and places to which the public has unhindered access. Electronic copies of the ESMF and SEP will be placed on the MOE and PMU website \_\_\_\_\_. This will allow stakeholders with access to the Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will have an online function allowing readers to submit their comments about the disclosed materials. The mechanisms that will be used for facilitating input from stakeholders will include press releases and announcements in the media, and notifications of the aforementioned disclosed materials to local, regional, and national NGOs as well as other interested parties.

In the case of disclosing Environmental and Social Impact Assessments (ESIAs), the legal framework in Ukraine is outlined in the Law "On Environmental Impact Assessment" (2017). According to the law, the public consultation process begins with the publication of an official notice regarding the commencement of the consultation on the EIA report. This notice must be made publicly accessible on the official websites of the relevant territorial or central authority and in public places within the area where the activity is planned. The notice includes key information such as a brief description of the planned activity, the business entity responsible, details of the consultation process, and instructions on how to access the EIA report. Public consultation lasts for a minimum of 25 working days and can include written submissions, as well as oral comments during public hearings, which must be recorded in the hearing minutes.

During the consultation period, the public has the right to submit comments and suggestions, which are taken into consideration by the authorities. Once the consultation period ends, the authority responsible for the consultation must prepare a report that includes details of the published information, the materials provided to the public, the minutes of the hearings, and a summary of the comments received, along with an explanation of how they were addressed. This report, along with the EIA, is made publicly available and is incorporated into the final decision-making process regarding the planned activity.

## 5.5. Timetable for disclosure

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within a timeframe that shall be agreed upon:

- Placement of the documents that should be disclosed in public domain – Dates to be confirmed in site specific SEP.
- 30-day disclosure period – Dates to be confirmed later in site specific SEP.
- Public consultation meetings in project affected communities and with other stakeholders to present and discuss findings of the documents - Dates to be confirmed in the site specific SEP.
- Addressing stakeholder feedback received on the entire disclosure package - Dates to be confirmed in site specific SEP.

The site-specific SEP developed under PPF Project implementation will remain in the public domain for the entire project development period and will be updated regularly as the project progresses through its various phases to ensure timely identification of any new stakeholders and interested parties and their involvement in the collaboration process. The engagement methods will also be revised periodically to maintain their effectiveness and relevance to the project’s evolving environment and safety situation in Ukraine.

The outline presented in the table below summarizes the project's main stakeholders, the types of information to be shared with stakeholder groups, and specific means of communication and notification.

Phase	Stakeholder groups	Project information shared	Means of Communication / Disclosure	Method	Responsibility
Ukraine Government PPF Project preparation	Central Governmental bodies Donors NGOs	Ukraine Government PPF Project PPF SEP  ESF Documents	Disclosure of this stakeholder management plan purpose, project design, and other project-related documentation	Publications on the official websites  Offline/online consultations  Meetings and round tables  Presentations  Official letters  GRM maintenance and	MOE and PMU

				<p>informational requests response</p> <p>The publications of a project's profiles on Digital Restoration Ecosystem for Accountable Management (DREAM)</p>	
Ukraine Government PPF Project Implementation stage	<p>Central Governmental bodies</p> <p>Donors</p> <p>NGOs</p> <p>LSGs</p>	<p>Communication campaign</p> <p>The project for its preparation under Ukraine Government PPF selection criteria, priorities, and strategy</p>	<p>Disclosure of the GoU`s strategy regarding the priorities of projects selection, eligibility criteria, description of the selection procedure, and other relevant information</p>	<p>Publications on the official websites</p> <p>Communication campaign in social media</p> <p>Public meetings and consultations</p> <p>Presentations</p> <p>The publications of a project's profiles on Digital Restoration Ecosystem for Accountable Management (DREAM)</p>	MOE and PMU
	All groups of stakeholders	<p>SEPs</p> <p>Feasibility studies</p> <p>ESIAs</p> <p>Designs</p> <p>ES documents according to donor`s standards</p>	<p>Disclosure of projects information according to national requirements (Environmental impact assessment, feasibility study, technical design, etc) or to Donor`s standards (ES documents, GRM, etc)</p>	<p>Publications on the official websites</p> <p>Public meetings and consultations</p> <p>Social media</p> <p>The publications of a project's profiles on Digital Restoration Ecosystem for Accountable Management (DREAM)</p>	MOE, PMU, LSG
Projects implementation stage	all groups of stakeholders identified in project`s SEP	Projects related information	Regular consultations during projects implementation	Publications on the official websites	PMU, LSG, Contractors

			<p>SEP updation (in case new groups of stakeholders will be identified)</p> <p>Design changes</p> <p>request for communication from the side of local community members</p>	<p>Public meetings and consultations</p> <p>Communication campaign in social media</p> <p>GRM maintenance and informational requests response</p> <p>The publications of a project's profiles on Digital Restoration Ecosystem for Accountable Management (DREAM)</p>	
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For vulnerable groups, the Ukraine Government PPF Project and projects that will be prepared under Ukraine Government PPF will facilitate tailored disclosure methods to ensure vulnerable and disadvantaged groups are adequately informed and engaged throughout the project. These groups, have already identified in Section 3 above, may face barriers to participation due to physical, social, or economic challenges. To address these barriers, it will be used accessible communication formats such as audio, visual aids, and plain language materials. Additionally, accessible online consultations will be organized for those who can participate digitally, and information will be disseminated through local NGOs and community leaders to ensure wider reach. Vulnerable and disadvantaged groups will have access to clear, understandable, and relevant information regarding project impacts and opportunities.

## 6. Resources and Responsibilities for implementing stakeholder engagement

### 6.1. Implementation Arrangements and Resources

MOE and PMU will retain the overall responsibility for managing and implementing this SEP including the preparation of SEPs for each reconstruction project selected for preparation under the PFF . MOE will have a dedicated Social Specialist responsible for coordinating, documenting, tracking, and manage all SEP activities in coordination with the Beneficiary Agency. The SEPs for construction projects may be prepared by the Management Consultants. The project’s Stakeholder Engagement Plans will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information

presented herein is consistent and is the most recent and that the identified methods of engagement remain appropriate and effective about the project context and specific phases of the development. Any major changes to the project-related activities and its schedule will be duly reflected in the project's SEPs.

The budget estimate for preparing and implementing SEP is 800,000 USD.

The following table provides preliminary and indicative information from the project budget on stakeholder engagement-related activities for 2025-2029. The budget will be finalized at the later stages of the Project:

Item	Estimated budget (USD)
Capacity Building and Awareness Events for Ukraine Government PPF Project Staff and Beneficiary Agencies	200,000
Consultation Activities for Ukraine Government PPF Project Design and Implementation	300,000
Preparation of TORs for Capacity Building Activities for Stakeholders	
Management of the DREAM GRM Module	
Prepare SEPs (Develop TORs and Procure SEPs for (indicative budget for projects in 2025-2026)	The cost will be included in the project development cost
SEPs implementation (consultations, publishing and disclosure)	
Preparation of the Technical Requirements and Technical Development of the GRM Module for DREAM Platform	100,000
Transport and other planned expenses related to the stakeholder engagement activities.	100,000
Project communication and awareness campaign	100,000
<b>TOTAL</b>	<b>800,000</b>

## 7. Grievance Mechanism

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

### 7.1. Description of Grievance Mechanism (GM)

The GRM structure and channels are preliminarily outlined and will be fully developed within three months of project effectiveness. This section will be updated accordingly.

Step	Description of process (e.g.)	Timeframe	Responsibility
GM implementation structure	MOE will develop and manage a dedicated GM during PPF implementation in accordance with the provisions of the WB's ESS10 and of this SEP. The GM will address all		



Project related grievances, including those received from Project's workers, direct affected parties, indirect affected communities' members and grievances related to the resettlement. During the Project implementation, it will be ensured equal and nondiscriminatory access to the GM, and special attention will be given to the disadvantaged/ vulnerable groups, people who are less informed.

The structure of the Grievance Mechanism (GM) will include several levels:

1. Project level will include a dedicated Complaints Committee for grievances resolution created from the representatives of the Project's hosting ministry of the Ukraine PPF (MOE) and implementation organization (PPP Agency). The number of members will be determined. This committee will examine and solve all Project related grievances, including grievances received from Project's workers (direct and contracted). This committee are a temporary body, established for the purpose of permanent dialogue with the people who consider themselves affected by the implementation of the Project. The committee will be active from the date of establishment until the end of the activities within the Project. The committee created within the Project for grievance redress do not replace the judicial way of examining disputes.

2. Projects level will include a GM for each projects, that will be created by the implementing authorities and contracting authorities.

<p>Grievance uptake</p>	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> <li>· Toll-free telephone hotline: [+380965828313] operated by [PPP Agency]</li> <li>· E-mail to [info@pppagency.me.gov.ua]</li> <li>· Letter to [PPP Agency, Kyiv, Antonovycha St., 174]</li> <li>· Social media [https://www.facebook.com/PPP AgencyUkraine]</li> <li>· Online form on the following website: [http://pppagency.gov.ua/uk/contact/]</li> </ul> <p>Grievances may be submitted anonymously. All anonymous grievances and complaints should be addressed and recorded as well as other grievances and complainants, Confidentiality must be ensured in all cases, including the case when the person submitting the appeal chooses anonymity.</p>		
<p>Sorting, processing</p>	<p>Any complaint received is forwarded to [central point of contact at the implementation organization (PPP Agency) - info@pppagency.me.gov.ua]; logged in [Complaints Log as a unique register/database]; categorized according to the following complaint types:</p> <ul style="list-style-type: none"> <li>○ Eligible complaints (the complaint pertains to the PPP Agency; the issues raised in the complaint fall within the scope of issues the grievance mechanism is authorized to address; the complainant has standing to file)</li> <li>○ Ineligible complaints (The complaint is clearly not related with PPP Agency; the nature of the issue is outside</li> </ul>	<p>Upon receipt of complaint</p>	<p>Central grievance focal points</p>

the mandate of the grievance mechanism; the complainant has no standing to file; other procedures are more appropriate to address the issue).

Eligible complaints categorized according to the following complaint types:

- Relatively minor and one-time problems related to PPP Agency operations
- Relatively minor but repetitive problems related to PPP Agency operations
- Relatively minor but repetitive and widespread problems
- Significant and larger repetitive problems
- Major claims over policy or procedural issues]

A Complaints Log as a simple database will be developed under the Project to manage and monitor the grievances. The documentation on grievances will include:

- the name and contact details of the complainant;
- the date and nature of the complaint;
- the specialist charged with addressing the complaint;
- any follow up actions taken;
- the proposed resolution of the complaint;
- how and when relevant Project decisions were communicated to the complainants; and
- feedback from complainants regarding their satisfaction with complaint resolution.

For the verbal grievances, it will be suggested to the complainant to file a written grievance/complaint or to use the number phone and e-mail address appointed for Project grievances in order to be directed to relevant staff/ Complaints Committee for appropriate grievance resolution.

Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by an official letter from the Agency via e-mail together with information on the time frame in which a response can be expected.	Within 2 days of receipt	Central grievance focal points
Verification, investigation, action	<p>Investigation of the complaint is led by the Complaints Committee, which facilitates the development and implementation of the GM, administers some of its resources, monitors internal and external good practice, ensures coordination among access points, and makes certain that the system is responsive to the information it manages. At the same time, the PPP Agency will additionally need the services of a professional complaints consultant or facilitator with experience in developing complaints mechanisms to help the Ukraine PPF get started.</p> <p>A proposed resolution is formulated by designated complaint-resolution social specialist and communicated to the complainant by an official letter from the Agency via e-mail.</p> <p>Information reported back might include types of cases and how they were resolved, and the way the grievance has influenced PPP Agency policies, procedures, operations, and the GM itself.</p>	Within 10 working days	Complaint Committee composed of <i>[insert]</i>
Monitoring and evaluation	<p>Data on complaints are collected in Complaints Log and reported to WB semiannually.</p> <p>The summary information on GM operation will be placed on PPP Agency website and submitted to the interested parties at request.</p>		

Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution will be collected and recorded in Complaints Log to see what types of responses are more effective, but also to identify persistent, recurrent, unresolved complaints that might signal deeper problems.		
Training	<p>For staff/consultants in the PMU, Project's hosting ministry of the Ukraine PPF (MOE) and implementation organization (PPP Agency), Management Support Contractor will need to be organized training course on Designing and Implementing Grievance Mechanism.</p> <p>In addition, it will be necessary to organize trainings for staff/consultants in implementing authorities and contracting authorities, who will have to designing and implementing GM for each projects in the future.</p>		
If relevant, payment of reparations following complaint resolution	Inappropriate		
Appeals process	<p>A grievance will be "closed" when a resolution satisfactory to all parties has been reached. In certain situations, however, it is possible to "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt.</p> <p>In such situations, the efforts to investigate the complaint and to arrive at a conclusion will be well documented and the complainant will be advised of the situation.</p> <p>If the complainant is not satisfied by the response or the proposed solution, he/she may appeal to court.</p>		

**Labor GM.** The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

## **8. Monitoring and Reporting**

### **8.1. Summary of how SEP will be monitored and reported upon (including indicators)**

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- 1) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- 2) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- 3) Status of grievance mechanism maintenance in grievance log format. Grievance log should include following:
  - Status of establishment of the GRM (procedures, staffing, awareness building, etc.);
  - Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
  - Qualitative data on the type of complaints and answers provided, issues that are unresolved;
  - Time taken to resolve complaints;
  - Number of grievances resolved at the lowest level, raised to higher levels;
  - Any particular issues faced with the procedures/staffing or use;
  - Factors that may be affecting the use of the GRM/beneficiary feedback system;
  - Any corrective measures adopted.
- 4) A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of public hearings, consultation meetings, and public discussions discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);

- Frequency of public engagement activities;
- Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
- Number of press materials published/broadcasted in the local, regional, and national media;
- Number of NGOs involved in an engagement process during reporting period (e.g. monthly, quarterly, or annually).

## **8.2. Reporting back to stakeholder groups**

The SEP will be periodically revised and updated throughout the Ukraine Government PPF Project implementation to ensure that the information it contains remains current and relevant. This will involve reviewing the methods of engagement to confirm their continued appropriateness and effectiveness, taking into account the evolving project context and its specific phases of development. Any significant changes to the project activities or its timeline will be reflected in the SEP, ensuring it remains aligned with the latest developments.

Additionally, the Ukraine Government PPF Project will communicate information on public engagement activities to stakeholders through the [MOE/PMU](#) websites. Each year, a summary of the stakeholder engagement activities will be provided, including details such as the location, number of participants, and key issues raised during meetings. Furthermore, the summary will highlight the measures recommended by MOE/PMU to address any concerns or issues raised during the engagement process, ensuring transparency and responsiveness to stakeholder needs.

# Annex 1. Stakeholder Engagement Plan (SEP) Template for High and Substantial Risk Projects

## 1. Introduction/Project Description

*[Insert short background/ paragraph about the country and sector context, project objectives, components, and location. Map(s) can be added in the document or in annexes].*

[Country/Sector Context]

[The *[name of project]* aims to *[add project development objective]*]

The *[name of project]* comprises the following components: *[list components and short description]* *[list locations]*

The *[name of project]* is being prepared under the World Bank's Environment and Social Framework (ESF).

## 2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the *[name of the implementing agency]* will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

## 3. Stakeholder identification and analysis per project component

### 3.1 Methodology

For the *[name of project]*, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

### 3.2. Affected parties

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category: *[add list of possible affected parties categorized by project component]*.

### 3.3. Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including: *[add list of other possible stakeholders]*.

### 3.4. Disadvantaged / vulnerable individuals or groups<sup>4</sup>

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<sup>4</sup> It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups are adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals



Within the Project, the vulnerable or disadvantaged groups may include but are not limited to the following: *[add list of possible vulnerable groups per each project component and possible barriers they may encounter in accessing information or other project benefits]*.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

#### 4. Stakeholder Engagement Program

##### 4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings will be/were conducted *[insert table listing meetings, venue, number of participants and key issues discussed]*.

##### 4.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement.

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

**Table 1: SEP Summary Table**

Project stage	Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
<i>Indicate whether it is:</i> - Preparation stage  -Implementation stage	<i>Examples may include:</i> General Public, Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Communities, persons with disabilities.	<i>Examples may include:</i> - Present the project and receive feedback on project activities. - Inform on progress, - Consult on key risks - Note public events to disseminate the results	<i>Examples may include:</i> - Focus Group Meetings/ Discussions - Community consultations - Formal meetings - Virtual discussions or surveys - One-on-one interviews - Site visits	<i>Name the agency/ministry in charge of stakeholder engagement activities</i>	<i>Add either specific dates or a given frequency (either MM/YY, or "monthly" / "quarterly" / "twice a year")</i>

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often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

		- Give information on GM			
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**4.3. Proposed strategy to incorporate the views of vulnerable groups**

The project will seek the views of [*vulnerable or disadvantaged groups identified*] through the following methods [*indicate methods of engagement*]. The following measures will be taken in order to remove obstacles to full and enabling participation / access to information: [*Indicate measures here*]<sup>5</sup>

**5. Resources and Responsibilities for implementing stakeholder engagement**

**5.1. Implementation Arrangements and Resources**

The [*insert*] will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities are [*insert*]. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director.

The project’s stakeholder engagement implementation arrangements are as follows: [*insert*]<sup>6</sup>

The stakeholder engagement activities will be documented through [*insert*]

The budget estimate for the preparing and implementing SEP is [*insert the total estimated amount*]. The budget breakdown can be found in Annex 2. See the sample budget line items listed in Annex 2.

**6. Grievance Mechanism**

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

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<sup>5</sup> Examples may include (i) women: ensure that community engagement teams are gender-balanced and promote women’s leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate; consider provisions for childcare, transport, and safety for any in-person community engagement activities; promote gender-segregated consultations and other approaches allowing for the free and enabling participation of women and girls, including groups of women and girls who are particularly vulnerable to exclusion and risks potentially associated with the project; consult with women’s organizations, including organizations advocating for survivors’ rights (ii) Pregnant women: develop education materials for pregnant women on basic hygiene practices, infection precautions, and how and where to seek care based on their questions and concerns; (iii) Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk & what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family member; (iii) Persons with disabilities: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology; consider and take into account gender and other dimensions of identity and vulnerability and (iv) Children: design information and communication materials in a child-friendly manner and provide parents with skills to gather and promote children’s voices, best interest, perspectives and participation; mobilize capacity as needed to be able to safely engage teenagers, and/or engage with organizations advocating for children’s rights.

<sup>6</sup> Integrate provisions for the mobilization of technical expertise for safe consultations with vulnerable groups, and/or on sensitive topics, as and when needed.

## 6.1. Description of Grievance Mechanism (GM)

Table 2: Illustrative Table on the GM Steps - to be adjusted to each project

[Step]	Description of process (e.g.)	Timeframe	Responsibility
GM implementation structure	<i>[Describe, for example, GM structure at national, regional, and local levels]</i>		
Grievance uptake	Grievances can be submitted via the following channels <i>[select and specify as appropriate]</i> Toll-free telephone hotline: <i>[include number]</i> operated by <i>[insert]</i> Short Message Service (SMS) to <i>[include number]</i> E-mail to <i>[insert]</i> Letter to <i>[insert]</i> In-person at a physical facility <i>[specify where]</i> Grievance or suggestion boxes located <i>[insert locations]</i> Social media <i>[insert relevant social media accounts]</i> Tablet/smartphone application <i>[specify]</i> Online form on the following website: <i>[insert]</i>		
Sorting, processing	Any complaint received is forwarded to <i>[insert]</i> ; logged in <i>[insert]</i> ; categorized according to the following complaint types: <i>[insert]</i>	Upon receipt of complaint	Local grievance focal points
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by <i>[insert]</i>	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by <i>[insert]</i> A proposed resolution is formulated by <i>[insert]</i> and communicated to the complainant by <i>[insert]</i>	Within 10 working days	Complaint Committee composed of <i>[insert]</i>
Monitoring and evaluation	Data on complaints are collected in <i>[insert]</i> and reported to <i>[insert]</i> every <i>[insert]</i>		
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected <i>[insert]</i>		
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants are <i>[insert]</i>		
If relevant, payment of reparations following complaint resolution	<i>[If relevant, describe how payment of reparations will be handled including amounts, recipients, etc.]</i>		

[Step]	Description of process (e.g.)	Timeframe	Responsibility
Appeals process	<i>[Describe how appeals will be handled when/if the complainants are not satisfied with the proposed resolution of the complaint]</i>		

*[Insert a few sentences about the Labor GM, which should be described in detail in the Labor Management Procedures and other project documents].*

*[Integrate a section to describe how Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints will be safely and ethically received and managed, through the different stages of the GM, as and where possible].<sup>7</sup>*

## 7. Monitoring and Reporting

### 7.1. Summary of how SEP will be monitored and reported upon (including indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)

Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.

Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex 3.

### 7.2. Reporting back to stakeholder groups

The SEP will be revised and updated as necessary during project implementation.

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<sup>7</sup> In some projects, the GM could be adapted to receive SEA/SH allegations/complaints. If so, the responses should follow a survivor-centered approach that prioritizes survivors' dignity, confidentiality and safety, and the project accountability and response framework. Kindly refer to the Good Practice Notes on Addressing SEA/SH in Investment Project Financing involving [Major Civil Works](#) (page 53) and in [Human Development Operations](#) (page 38).

[Quarterly or other] summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders include the following *[insert the specific mechanism/avenues to be used by the project to report back to the stakeholder groups that have been/will be consulted]* This reporting back to the stakeholders will be *[insert the timeline/frequency of such reporting]*.

## Annexes

Annex 1.1. Template to capture minutes/records of consultation meetings

Annex 1.2. Example of a SEP Budget Table

Annex 1.3. Sample Table: Monitoring and Reporting on the SEP

Other Annexes can include:

Visual summaries such as stakeholder mapping or stakeholder diagrams

Grievance submission form

Project maps (if applicable)

### Annex 1.1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

### Annex 1.2: Example of a SEP Budget Table

Budget categories	Quantity	Unit costs	Times/ Years	Total costs	Remarks
<b>1. Estimated Staff salaries* and related expenses</b>					
1a. <i>E.g., Communications consultant</i>					
1b. <i>E.g., Travel costs for staff</i>					
1c. <i>E.g., Estimated salaries for Community Liaison Officers</i>					
<b>2. Consultations/ Participatory Planning, Decision-Making Meetings</b>					
2a. <i>E.g., Project launch meetings</i>					
2b. <i>E.g., Organization of focus groups</i>					
<b>3. Communication campaigns</b>					
3a. <i>E.g., Posters, flyers</i>					
3b. <i>E.g., Social media campaign</i>					
<b>4. Trainings</b>					
4a. <i>E.g., Training on social/environmental issues for PIU and contractor staff</i>					
4b. <i>E.g., Training on Gender-Based Violence (GBV) for PIU and contractor staff</i>					
<b>5. Beneficiary surveys</b>					
5a. <i>E.g., Mid-project perception survey</i>					
5b. <i>E.g., End-of-project perception survey</i>					
<b>6. Grievance Mechanism</b>					
6a. <i>E.g., Training of GM committees</i>					
6b. <i>E.g., Suggestion boxes in villages</i>					

6c. E.g., GM communication materials					
6d. E.g., Grievance investigations/site visits					
6e. E.g., GM Information System (setting up or maintenance)					
6f. Other GM Logistical Costs					
<b>7. Other expenses</b>					
7a. ...					
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>					

\*Note: Salary costs can be indicative

### Annex 1.3. Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p><b>GM.</b> To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<p>Are project affected parties raising issues and grievances? How quickly/effectively are the grievances resolved?</p>	<p>Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion boxes placed in the villages/project communities. Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category</p>	<p>Records from the implementing agency and other relevant agencies</p>

		of grievance, gender, age, and location of complainant.	
<p><b>Stakeholder engagement impact on project design and implementation</b></p> <p>. How have engagement activities made a difference in project design and implementation ?</p>	<p>Was there interest and support for the project? Were there any adjustments made during project design and implementation based on the feedback received? Was priority information disclosed to relevant parties throughout the project cycle?</p>	<p>Active participation of stakeholders in activities Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. Number of disaggregated engagement sessions held, focused on at-risk groups in the project.</p>	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>
<p><b>Implementation effectiveness.</b></p> <p>Were stakeholder engagement activities effective in implementation ?</p>	<p>Were the activities implemented as planned? Why or why not? Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?</p>	<p>Percentage of SEP activities implemented. Key barriers to participation identified with stakeholder representatives. Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.</p>	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>



## **Annex 2. Stakeholder Engagement Plan (SEP) Template for Moderate Risk Projects**

**Template Instructions:** The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The scope and level of detail of the SEP should be commensurate with and proportionate to the nature and scale, potential risks, and impacts of the project and the concerns of the stakeholders who may be affected by or are interested in the project.

Depending on the nature of the scale of the risks and impacts of the project, the elements of a SEP may be included as part of the Environmental and Social Commitment Plan (ESCP), for example, with Low Risk projects, and preparation of a stand-alone SEP may not be necessary.

For Moderate Risk Projects, whereby E&S risks may be less complex than High or Substantial Risk projects, this simplified SEP template may be used. Use of this simplified template is optional and should be used together with the accompanying Tip Sheet (separate document).

The SEP should be clear and concise; the suggested length is **no more than 20 pages including annexes**. Each section has a suggested page limit.

Throughout the document, instructions are in red and should be deleted upon completion. Information specific to the project should be inserted where there are [ ] (for example, “[name of project]”) Delete the [ ] when inserting information.

### **1. Introduction/Project Description (suggested length: 1 page)**

Describe project objectives, components, and location. Add link to Project Information Document (PID) if available.

The [name of project] aims to [add project development objective].

The [name of project] comprises the following components: [list components and short description] [list locations].

The [name of project] is being prepared under the World Bank’s Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

### **2. Objective/Description of SEP**

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

### **3. Stakeholder identification and analysis (suggested length: 1–2 pages)**

#### **3.1 Methodology**

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

*Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

*Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.

*Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

*Flexibility:* (include if relevant) If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

### 3.2. Affected parties and other interested parties <sup>8</sup>

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category: [add list of possible affected parties, positive or negative].

The projects' stakeholders also include parties other than the directly affected communities, including [add list of other possible stakeholders. Examples include NGOs or civil society groups at the local and national levels, business owners and providers of services within the project area, other government officials].

### 3.3. Disadvantaged/vulnerable individuals or groups<sup>9</sup>

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<sup>8</sup> For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

<sup>9</sup> It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following: [add table or list of possible vulnerable groups and the barriers to accessing information, or other Project benefits. Examples include elderly people, persons with disabilities and their caretakers, women-headed households, sexual and gender minorities, the unemployed, and disadvantaged groups that meet the requirements of ESS 7. Identify representative organizations and leaders for these groups who can be partners in stakeholder engagement].

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

#### 4. Stakeholder Engagement Program (suggested length: 3 pages max)

##### 4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted [insert brief summary description of meetings held, venue, number of participants, and key issues discussed]. Refer to Annex Table 1 for details.

The environmental and social reports and plans were disclosed through [insert]. Feedback received during consultations was [insert summary of key points raised by stakeholders] and was taken into account by [insert]. A summary of the main recommendations received and integrated into the Stakeholder Engagement Plan is provided in Annex table 1.

##### 4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below: [insert description. Examples may include (i) structured agendas, (ii) focus group meetings/discussions, (iii) community consultations, (iv) formal meetings, (v) one-on-one interviews, and (vi) site visits.]

##### 4.3. Stakeholder engagement plan

Complete table below.

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities

Note: Highlight activities focused on vulnerable groups in the above table. Pay particular attention to vulnerable groups such as poor women, persons with disabilities, and others.<sup>10</sup> Under “Methods Used,” examples may include, as

<sup>10</sup> Examples may include (i) Women: ensure that community engagement teams are gender-balanced and promote women’s leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate; consider provisions for childcare, transport, and safety for any in-person community engagement activities; there may also be women who face multiple challenges, for example, indigenous women, women with disabilities, etc. (ii) Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk and what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members; (iii) People with disabilities: provide information in accessible formats, such as braille or large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for the hearing impaired,

appropriate: (i) for government entities: correspondence by phone/email; one-on-one interviews; formal meetings; and roundtable discussions; and (ii) for local communities/vulnerable groups: letters to village leaders; traditional notifications; disclosure of Project documentation in a culturally appropriate and accessible manner; community meetings; focus group discussions; outreach activities.

Information will be disclosed as follows: [Briefly describe what information will be disclosed (for example, SEP; relevant E&S documents; Grievance Mechanism (GM) procedures; project orientation; regular updates on project developments); and in what formats (for example, public notices, press releases, Project website; consultation meetings; information leaflets and brochures; separate focus group meetings with vulnerable groups). Indicate which language will be used to disclose information.]

#### 4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

### 5. Resources and Responsibilities for implementing stakeholder engagement activities (suggested length: 2 pages)

#### 5.1. Resources

The [insert name of entity] will be in charge of stakeholder engagement activities.

The budget for the SEP is [insert] and is included in component [insert] of the project.

An example of a budget table is included below (only include those categories that apply). Complete table below:

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
<b>1. Estimated staff salaries* and related expenses</b>					
1a. [E.g., communications consultant]					
1b. [E.g., travel costs for staff]					
1c. [E.g., estimated salaries for Community Liaison Officers]					
<b>2. Events</b>					
2a. [E.g., organization of focus groups]					
<b>3. Communication campaigns</b>					
3a. [E.g., posters, flyers]					
3b. [E.g., social media campaign]					
<b>4. Trainings</b>					

and online materials for people who use assistive technology; and (iv) Children: design information and communication materials in a child-friendly manner and provide parents with skills to handle their own anxieties and help manage those in their children.

4a. [E.g., training on social/environmental issues for PIU and contractor staff]					
4b. [E.g., training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff]					
<b>5. Beneficiary surveys</b>					
5a. [E.g., mid-project perception survey]					
5b. [E.g., end-of-project perception survey]					
<b>6. Grievance Mechanism</b>					
6a. [E.g., training of GM committees]					
6b. [E.g., suggestion boxes in villages]					
6c. [E.g., GM communication materials]					
<b>7. Other expenses</b>					
7a. [insert]					
<b>TOTAL STAKEHOLDER ENGAGEMENT BUDGET:</b>					

Note: \*Salary costs can be indicative.

## 5.2. Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are [insert].

The stakeholder engagement activities will be documented through [insert].

## 6. Grievance Mechanism (suggested length: 2 pages max)

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

### 6.1. Description of GM

Complete table below. Examples are listed below for illustrative purposes; only include the examples that apply.

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	[Describe, for example, GM structure at national, regional, and local levels]		
Grievance uptake	Grievances can be submitted via the following channels: [e.g. Toll-free telephone hotline/Short Message Service (SMS) line E-mail Letter to Grievance focal points at local facilities]		

Step	Description of Process	Time Frame	Responsibility
	Complaint form to be lodged via any of the above channels Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box]		
Sorting, processing	Any complaint received is forwarded to [insert], Logged in [insert], and categorized according to the following complaint types: [X/Y/Z]	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by [insert]	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by [insert] A proposed resolution is formulated by [insert] and communicated to the complainant by [insert]	Within 10 working days	Complaint Committee composed of ..., ... and ...
Monitoring and evaluation	Data on complaints are collected in [insert] and reported to [insert] every [insert]		
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected [insert]		
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows: [insert]		
If relevant, payment of reparations following complaint resolution	[Describe how reparations will be handled including amounts, recipients, etc.]		

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

[When relevant, the project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the World Bank ESF Good Practice Note on SEA/SH. Insert description if relevant]

[Also insert a few sentences about the Labor Grievance Mechanism, including that it exists and that workers can use it. The Labor GM should be described in detail in the Labor Management Procedures].

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

## **7. Monitoring and Reporting (suggested length: half a page)**

### **7.1. Summary of how SEP implementation will be monitored and reported**

Describe SEP monitoring and reporting arrangements. Include indicators, for example, number of community meetings held to discuss project progress, number of information boards displayed, etc.). Describe involvement of stakeholders in monitoring activities, if applicable.

**7.2. Reporting back to stakeholder groups**

The SEP will be periodically revised and updated as necessary in the course of project implementation. [insert Quarterly or other] summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The [quarterly or other] summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways: [insert].

**Annexes**

These can include:

Records of meetings or consultations (see table 1)

Visual summaries such as stakeholder mapping or stakeholder diagrams

Grievance submission form, etc.

**Table 1. Template to Capture Consultation Minutes**

Complete table below.

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable / Date to Complete Follow-up Action(s)

### **Annex 3. Guidelines for stakeholder identification and categorization**

- Who will be adversely affected by potential environmental and social impacts in the project's area of influence?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- At which stage of project development will stakeholders be most affected (e.g. procurement, construction, operations, decommissioning)?
- What are the various interests of project stakeholders and what influence might this have on the project?
- Which stakeholders might help to enhance the project design or reduce project costs?
- Which stakeholders can best assist with the early scoping of issues and impacts?
- Who strongly supports or opposes the changes that the project will bring and why?
- Whose opposition could be detrimental to the success of the project?
- Who is it critical to engage with first, and why?
- What is the optimal sequence of engagement?



## Annex 4. The list of organizations (governmental and non-governmental) to engage in consultations

The list is tentative and will be added on to throughout project implementation

Name of NGO, CSO, Think Tanks	Area of Interest/Mission	Contact Information
RISE Ukraine	RISE Ukraine is a coalition of Ukrainian and international public organizations, initiatives, state institutions and activists who support <b><u>Principles for Ukraine’s Reconstruction and Modernization</u></b> through constructive dialogue with the authorities and international partners.	<a href="https://www.rise.org.ua/">https://www.rise.org.ua/</a>  Info@rise.org.ua
CASE Ukraine	<p>CASE Ukraine is one of Ukraine's oldest and most influential centers of public policy studies.</p> <p>CASE Ukraine was founded in 1999 by <u>CASE – Center for Social and Economic Research (Warsaw)</u> as a part of a successor to the USAID funded CASE policy advising project on “Ukraine Macroeconomic Policy Program” implemented together with the Harvard Institute of International Development between 1996 and 2001.</p> <p>Starting in 1999 CASE Ukraine have undertaken more than 50 research and educational projects commissioned by the US Agency for International Development, the European Commission, the Open Society Institute, the UN Development Program, the World Bank, the World Economic Forum, the Swedish International Development Agency, and others.</p> <p>CASE Ukraine operates as an independent Ukrainian NGO being a part of the CASE network that includes analytical centers in Poland, Kyrgyzstan, Moldova, Georgia and Belarus.</p>	+38 044 227-53-17  info@case-ukraine.com.ua  10 Poltavska St., Office 34  Kyiv 01135, Ukraine
KSE Institute	KSE Institute is an analytical center at the Kyiv School of Economics. It specializes in analytics, consulting, research, develops strategies and recommendations for supporting a strong and innovative economy of Ukraine. KSE Institute provides consulting services for the public and	<a href="https://kse.ua/kse-department/kse-institute/">https://kse.ua/kse-department/kse-institute/</a>  <a href="mailto:kse_institute@kse.org.ua">kse_institute@kse.org.ua</a>

	private sectors. It is one of the largest Think Tanks in Ukraine.	
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## **Annex 5. Report on Consultations**

(to be updated following consultations)